

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:	*	
	*	Bankruptcy Case
MOHAMED A. ELE RAFAEI	*	Case No. 20-12583-KHK
Debtor.	*	Chapter 7
* * * * *	*	* * * * *
H. JASON GOLD, CHAPTER 7	*	
TRUSTEE	*	
	*	
Plaintiff	*	
	*	
v.	*	Adversary Proceeding
	*	Case No. 22-01094-KHK
ADEL S. KEBASH, et al.	*	
	*	
Defendant.	*	
* * * * *		* * * * *

EXPERT DESIGNATION

NOW COMES, Plaintiff, H. Jason Gold, Chapter 7 Trustee, by counsel, pursuant to Federal Rule of Civil Procedure 26, Rule 7026 of the United States Federal Rules of Bankruptcy Procedure, and Local Rule 7026-1(L), and files this Expert Designation, designating the following experts to testify at trial:

1. H. Jason Gold, P.O. Box 57359, Washington, DC 20037. He was not retained or specially employed to provide expert testimony in this case. He is the Chapter 7 Trustee in this case. He obtained a B.A. from American University in 1976, and a law degree from The Catholic University of America, Columbus School of Law in 1979. He worked in private practice handling complex restructuring and insolvency matters, including at Gold, Morrison & Laughlin, PC, Wiley Rein LLP, and Nelson Mullins Riley &

Scarborough LLP, at various points throughout his career. He also has served on the Board of Directors of the Freedom Bank of Virginia.

He will testify that the payments made by the Debtor were not made in the ordinary course of business. He will base his opinions on his training, education, experience, his familiarity with the commercial property industry, and a review of the lease, the payment checks, the full record of the bankruptcy case including the schedules, other filings, and the pleadings and discovery in this case, including, but not limited to, the Defendant's and Debtor's bank records, credit card statements, loan documents, written discovery responses, and testimony given under oath in this case and other related cases, and real property records, all of which has been or will be produced in discovery.

2. Plaintiff reserves the right to call additional or substitute experts to testify to the same opinions as set forth above.

3. Discovery is ongoing. The Defendant has not responded to written discovery, and has not been deposed. Plaintiff reserves the right to name additional or substitute experts based upon the receipt of additional information.

4. Plaintiff reserves the right to elicit expert testimony from any expert designated by any other party in this matter.

H. Jason Gold, Chapter 7 Trustee
By Counsel

/s/ Charles B. Peoples
Charles B. Peoples, Esquire
Virginia Bar No. 89981
Thomas, Thomas & Hafer LLP
1025 Connecticut Avenue NW, Suite 608
Washington, DC 20005
202-945-9501 (p)
202-945-9509 (f)

cpeoples@tthlaw.com
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY on this 24th day of January, 2023, that the foregoing Expert Designation was served electronically on and mailed to the following via first class mail postage prepaid:

Adel S. Kebaish
Tysons LLC a/k/a Tyson's LLC
2333 Hunter Mill Road
Vienna, VA 22181
Defendants

/s/ Charles B. Peoples
Charles B. Peoples, Esquire
Virginia Bar No. 89981